

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AMERICAN ASSOCIATION OF UNIVERSITY
PROFESSORS, ET AL.,

Plaintiffs,

v.

MARCO RUBIO, ET AL.,

Defendants.

Case No. 1:25-cv-10685 (WGY)

DECLARATION OF NOAM BIALE

I, Noam Biale, declare as follows:

1. I am a partner at the law firm Sher Tremonte LLP. I represent Plaintiffs in the above-captioned case and have been admitted *pro hac vice* to this court.
2. I respectfully submit this declaration in support of Plaintiffs' Opposition to Defendants' Motion to Compel the Names of Plaintiffs' Witnesses.
3. Attached as **Exhibit A** to this declaration is a true and correct copy of email correspondence between the parties.
4. Attached as **Exhibit B** to this declaration is a true and correct copy of a June 12, 2025 letter to Jesse Busen summarizing the topics discussed at the parties' meet and confer earlier that day.
5. In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

June 16, 2025
New York, New York

Respectfully submitted,

/s/ Noam Biale

Noam Biale

Counsel for Plaintiffs